

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

Jeffrey B. Fisher  
Doreen A. Strothman  
Virginia S. Inzer  
William K. Smart  
Carletta M. Grier  
9440 Pennsylvania Avenue, Suite 350  
Upper Marlboro, MD 20772

-Plaintiffs-

-vs-

Kimmy R. Cathey AKA Kim Cathey  
6226 Joe Klutsch Drive  
Fort Washington, MD 20744  
-Defendants-

Civil Case No. 15-CV-1357

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
2015 MAY 14 PM 1:17  
CLERK'S OFFICE  
AT GREENBELT  
BY  DEPUTY 

**AMENDED NOTICE OF REMOVAL**

COMES NOW Kimmy R Cathey (Homeowner) to file this Notice of Removal of this action to The United States District Court For The District Of Maryland and sets forth the following grounds for removal:

1. This suit in foreclosure action filed In The Circuit Court For Prince George's County, Maryland on July 23, 2013 entitled "Jeffrey B Fisher vs. Kimmy R Cathey" Civil Action Number CAEF13-21010. A copy of the Notice of Foreclosure Action and exhibits are attached hereto and represents all process and pleadings served upon the Defendant in this

matter.

2. Defendant at the time of the filing of this action, and still are, residents of Maryland.
3. The above described action is one of which The United States District Court has original jurisdiction based on 28 U.S.C. 1441 Removal of civil action (c) Joinder of Federal Law Claims and State Law Claims.-(1) If a civil action includes- (A) a claim arising under the Constitution, laws, or treaties of the United States (within the meaning of section 1331 of this title), and (B) a claim not within the original or supplemental jurisdiction of the district court or a claim that has been made non-removable by statute, the entire action may be removable if the action would be removable without the inclusion of the claim described in subparagraph (B). Thus removal is proper where “separate and independent” claims that arise under federal law are joined to otherwise non-removable claims.
4. Defendant Kimmy R Cathey is a defendant to an action in state court and may remove a case under § 1441(c) (1)(A).
5. The court can identify the party removing this case is Defendant Kimmy R Cathey, and it is the Trustees who brought forth the case in when they filed the Order to Docket to initiate the foreclosure proceedings in the Circuit Court for Prince George’s County Maryland. See Md Rule 14-207; Md. CODE ANN., Real Prop. §7-105.1(d). (citing *Shamrock Oil & Gas Corp. v. Sheets*, 313 U.S. 100, 107-09 (1941); *Palisades Collections LLC v. Shorts*, 552 F.3d 327, 332 (4th Cir. 2008)).

[signature block follows]

Respectfully Submitted,

A handwritten signature in blue ink, reading "Kimmy R. Cathy", is written over a horizontal line.

Kimmy R. Cathy  
6226 Joe Klutsch Drive  
Fort Washington, MD 20744

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, under penalties of perjury, that a true and correct copy of the foregoing Notice of Removal was furnished to the Plaintiffs attorney of record, via USPS first class mail on or about May 14 2015 as follows: Jeffrey B Fisher, The Fisher Law Group, PLLC, 9440 Pennsylvania Avenue, Suite 350, Upper Marlboro, MD 20772.

Signed by

A handwritten signature in blue ink, reading "Kimmy R. Cathy", is written over a horizontal line.

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DEPUTY

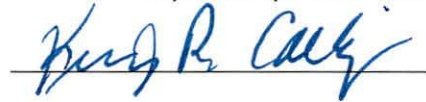
**AMENDED NOTICE OF FILING NOTICE OF REMOVAL**

To: The Honorable Sydney J. Harrison,  
CLERK OF THE CIRCUIT COURT  
FOR PRINCE GEORGE'S COUNTY,  
MARYLAND  
COURTHOUSE, ROOM D-1015  
14735 MAIN STREET  
COURTHOUSE, UPPER  
MARLBORO, MD 20772  
PHONE: (301) 952-3318

Dear Clerk:

Please take notice that on May 14 2015, Defendants/Appellant Kimmy R Cathey caused to be filed in the United States District Court For The District of Maryland a certain Notice of the Notice of Removal of the above captioned case, originally commenced In The Circuit Court For Prince George's County, Maryland with an order to docket residential foreclosure filed on May 14, 2015. A copy of said Notice of the Notice of Removal is herewith served upon you.

Respectfully Submitted,



Kimmy R. Cathy  
6226 Joe Klutsch Drive  
Fort Washington, MD 20744

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, under penalties of perjury, that a true and correct copy of the foregoing Notice Of The Notice Of Removal was furnished to the Plaintiffs attorney of record, via USPS first class mail on or about May 14 2015 as follows: Jeffrey B Fisher, The Fisher Law Group, PLLC, 9440 Pennsylvania Avenue, Suite 350, Upper Marlboro, MD 20772.

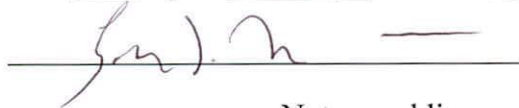
Signed by Kimmy R. Cathy

STATE OF MARYLAND

COUNTY OF PRINCE GEORGE'S COUNTY

Sworn to (or affirmed) and subscribed before me

This 14<sup>TH</sup> day of MAY, 2015, By KIMMY R. CATHEY



Notary public

My Commission Exp. MAY 12, 2016

ERIC L. MCCAMEY  
NOTARY PUBLIC STATE OF MARYLAND  
My Commission Expires May 12, 2016





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CLERK'S OFFICE  
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BY K DEPUTY

**AMENDED CERTIFICATE OF FILING STATE COURT DOCUMENTS**

Defendant Kimmy R Cathey hereby certify that the documents attached to the Notice of Removal Exhibit A. Notice of Foreclosure Action, is a true and a correct, or accurate copy of the documents on file in state court, and that it constitutes all the fillings in the lawsuit filed in the lawsuit filed in the Circuit Court for Prince George's County entities "Jeffrey B Fisher vs. Cathey", case number CAEF 13-21010, that the removing Defendant have been able to obtain copies of or have in their possession.

[signature block follows]

Respectfully Submitted,



Kimmy R. Cathy  
6226 Joe Klutsch Drive  
Fort Washington, MD 20744

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, under penalties of perjury, that a true and correct copy of the foregoing Certificate of Filing State Court Documents was furnished to the Plaintiffs attorney of record, via USPS first class mail on or about May 14 2015 as follows: Jeffrey B Fisher, The Fisher Law Group, PLLC, 9440 Pennsylvania Avenue, Suite 350, Upper Marlboro, MD 20772.

Signed by

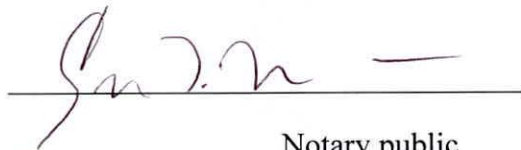


STATE OF MARYLAND

COUNTY OF PRINCE GEORGE'S COUNTY

Sworn to (or affirmed) and subscribed before me

This 14<sup>th</sup> day of MAY, 2015, By KIMMY R. CATHY



Notary public

ERIC L. MCCAMEY  
NOTARY PUBLIC STATE OF MARYLAND  
My Commission Expires May 12, 2016

My Commission Exp. MAY 12, 2016

